

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

**INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,**

Plaintiffs,

v.

SOUTHWEST AIRLINES CO.,

Defendant.

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Civil Action No. 7:24-cv-00277-ADA

JURY TRIAL DEMANDED

DECLARATION OF CHRISTOPHER MUHICH

I, Christopher Muhich, declare as follows:

1. I am Managing Director of Aircraft Engineering at Southwest Airlines Co. (“Southwest”). I lead a team of approximately 100 engineers responsible for aircraft configuration and am familiar with the in-flight WiFi systems used on Southwest aircraft. I make this declaration based on my personal knowledge and information obtained through my role at Southwest.

2. Southwest does not design, develop, or modify the in-flight WiFi systems used on its aircraft. These systems are designed, supplied, and managed by two manufacturer-vendors: Viasat, Inc. (“Viasat”) and Anuvu Operations LLC (“Anuvu”). These manufacturer-vendors provide all the hardware, software, and connectivity services required to operate their respective in-flight WiFi systems.

3. The manufacturer-vendors maintain exclusive design control over the components, configurations, and functions of the in-flight WiFi systems. The manufacturer-vendors are responsible for providing and implementing any updates or changes to the systems, including the operation of passenger connection portal functionality. Southwest does not update any hardware or software provided by the manufacturer-vendors.

4. Southwest is not responsible for the ultimate design, functionality, or changes to the operation of in-flight WiFi systems including any relevant code or technical documentation, which are maintained by the manufacturer-vendors.

5. Southwest is a downstream user of the in-flight WiFi systems provided by Viasat and Anuvu. Southwest relies on the manufacturer-vendors for ongoing system service, support, updates, and resolving technical issues concerning the in-flight WiFi systems.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 12, 2025, in Dallas, Texas.



Christopher Muhich
Managing Director Aircraft Engineering
Southwest Airlines Co.